



November 3, 1995

Mr. Ruben McCullers
Work Assignment Manager
RCRA Branch, Waste Management Division
U.S. EPA Region 7
726 Minnesota Avenue
Kansas City, Kansas 66101

**Subject: Review Comments on the Supplemental Environmental
Projects (SEP) Investigation Report for the
Knapheide Manufacturing Company, West Quincy, Missouri
EPA Contract No. 68-W4-0004, Work Assignment No. R07001**

Dear Mr. McCullers:

PRC Environmental Management, Inc. (PRC), has reviewed the SEP Investigation Report dated October 23, 1995. PRC reviewed the above-mentioned report to determine if it met the requirements of Paragraph 5 of the First Modification to the Consolidated Consent Agreement and Consent Order (CA/CO), dated March 8, 1995, and if the proposed SEPs complied with the "Policy on the Use of Supplemental Enforcement Projects in EPA Settlements," dated February 12, 1991.

PRC is submitting a hard copy and an electronic disk copy of the review comments on the above-referenced document. These review comments have been stamped draft because they have not been through PRC's internal review process. The document was received by PRC on November 1, 1995, and the REPA contract is suspended as of November 3, 1995, therefore, there was not ample time for the comments to be reviewed internally by PRC.

If you have any questions or comments, please call me at (913) 573-1826.

Sincerely,

Patrick Splichal
Environmental Scientist

Enclosure

cc: Aaron Zimmerman, U.S. EPA-RPO (letter only)
John Parks, PRC (letter only)
Mark Johnson, PRC



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RCRA Records Center

INTRODUCTION

PRC Environmental Management, Inc. (PRC), reviewed the Supplemental Environmental Projects (SEP) Investigation Report submitted by the Knapheide Manufacturing Company (Knapheide) on October 23, 1995. The SEP Investigation Report was reviewed to determine if it met the requirements of Paragraph 5 of the First Modification to the Consolidated Consent Agreement and Consent Order (CA/CO), dated March 8, 1995, and if the proposed SEPs complied with the "Policy on the Use of Supplemental Enforcement Projects in EPA Settlements," dated February 12, 1991. PRC had no general comments on the SEP Investigation Report. The following comments are all specific comments.

COMMENTS

1. **Section III, Page 2, Paragraph 2.** The report states that a wastewater discharge permit from the City of Quincy was applied for in December 1993 and as of the investigation of the facility, Knapheide has not been issued the wastewater discharge permit by the City of Quincy. This is a time period of nearly two years. The report should explain why the City of Quincy has failed to issue the permit.

In this same paragraph, it is mentioned that process water from the facility is placed in the sanitary sewers. The report should state whether the process water has been sampled and characterized and, if so, what implications this has on the wastewater discharge permit.

2. **Section VIII, Page 5, Items 1 through 4.** This section lists four recommendations on procedural changes for Knapheide to make to comply with current environmental regulations. The recommendations do not provide a schedule for compliance. Paragraph 5b. of the First Modification to the CA/CO states that any area of noncompliance must have a schedule and plan for coming into compliance. This report must state a schedule for each area coming into compliance.
3. **Part II, Page 5, Proposed SEP 1.** This proposed SEP is to pave the parking areas and driveways to reduce fugitive dust emissions. The report claims this activity is not required by any environmental regulations. However, paragraph 1 on page 2 of the SEP Investigation Report states that 35 Illinois Administrative Code 212.306 "requires a manufacturing facility to pave all traffic pattern roads and parking area or to treat them with water, oils, or chemical dust suppressants." Knapheide must clarify this discrepancy and demonstrate that paving the parking areas and driveways is not required by any environmental regulations and would qualify as an SEP.
4. **Part II, Page 6, Proposed SEP 2.** This proposed SEP is to construct a stormwater holding basin along with stormwater drainage. Knapheide must demonstrate that this activity is not necessary to comply with stormwater regulations in the Clean Water Act or that a permit is not required for Knapheide before this activity can qualify as an SEP.

5. **Part II, Page 6, Proposed SEP 3.** This proposed SEP is for the installation of a non-chlorofluorocarbon (CFC) air conditioning system at the new plant to reduce potential depletion of ozone. PRC concedes that this is a pollution reduction measure that qualifies as an SEP. However, when Knapheide constructs its new plant, it will have to install an air conditioning system of some type which is a good management practice. Knapheide must demonstrate that the cost of installing a non-CFC air conditioning system is above and beyond that of a CFC air conditioning system and that it is installed prior to the Clean Air Act regulations banning the use of CFCs before this activity can qualify as an SEP.
6. **Part II, Page 6, Proposed SEP 4.** This proposed SEP is for the installation of an electrodeposition (EDP) painting system in order to reduce volatile organic compound (VOC) emissions. First, for this activity to qualify as an SEP, Knapheide must demonstrate through actual numbers that the VOC emissions from this new painting process are below those specified by the Illinois Environmental Protection Agency (IEPA). Secondly, Knapheide must clarify if this new EDP painting system is to be installed in the temporary plant or in the new plant. If the EDP painting system is to be installed in the new plant, PRC recommends that a penalty offset only be calculated on the additional cost (if any) of the installation of the EDP painting system over that of Knapheide's current system. In order for the new plant to operate, it has to have some type of painting system so it is not reasonable to allow Knapheide penalty offset for the entire cost of installation of the EDP painting system.
7. **Part II, Page 6, Proposed SEP 5.** This proposed SEP is for the installation of high volume low pressure (HVLP) guns which would reduce VOC emissions from painting operations. This activity could qualify as a pollution reduction measure and deserves future consideration. First, Knapheide must demonstrate with actual numbers that the use of the HVLP guns reduces VOC emissions to levels below those required by the IEPA. Second, for potential penalty offset determinations, Knapheide must state whether this activity is to occur in the temporary plant or in the new plant.
8. **Part II, Page 7, Proposed SEP 6.** This proposed SEP is for the installation of high-efficiency lighting to conserve electrical power which could in turn reduce emissions at the utility generation plants. This activity could qualify as a pollution reduction measure and deserves future consideration. First, Knapheide must provide numbers to demonstrate the amount of energy it would save over conventional lighting. Second, for potential penalty offset determinations, Knapheide must state whether this activity is to occur in the temporary plant or new plant. The new facility will need some type of lighting, so the penalty offset for the new plant should be much less than if the high-efficiency lights are to be installed in the temporary facility which already has lighting.

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